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February 28, 2024

Via ECF

Hon. Mitchell J. Katz
U.S. Magistrate Judge
U.S. District Court for the
Northern District of New York
Federal Building and U.S. Courthouse
P.O. Box 7396
Syracuse, NY 13261-7396

Re: *Estate of JLA v. Town of DeWitt, Corey Fike, et al.*
Case No. 5:22-cv-00287-MAD-ATB

Dear Magistrate Judge Katz:

This office represents Defendant New York State Trooper Corey Fike. I write on behalf of all defendants, with the consent of the Plaintiff, to request an extension of Defendants' expert disclosure and other associated deadlines.

Plaintiff recently served its expert disclosure on the Defendants. Defendants' expert disclosure deadline is currently set for March 18, 2024. While party depositions have been largely completed and transcripts thereof received, we still await the transcripts of certain party depositions which have been taken. In addition, multiple other depositions noticed by the Plaintiff, while scheduled, remain to be conducted and transcripts thereof obtained. Our expert will need to review all of those transcripts before preparing his report. Because depositions are scheduled through March 21, 2024 and transcripts have been following roughly a month later, the Defendants respectfully request an extension of their expert disclosure deadline from March 18, 2024 until May 17, 2024. This would also entail corresponding extensions of the time for expert rebuttal disclosure from April 1, 2024 to May 31, 2024, for the completion of all disclosure from May 1, 2024 to June 28, 2024, and for dispositive motions from June 28, 2024 to August 28, 2024.

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This is the first such extension requested by the Defendants.

Thank you for Your Honor's consideration and courtesies in this regard.

Very truly yours,

BOND, SCHOENECK & KING, PLLC

/s/ Mitchell J. Banas, Jr.

Mitchell J. Banas, Jr.

MJB/rpk

cc: All Counsel (*via ECF*)

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